

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	Case No. 3:22-cr-00323
v.)	Judge Waverly D. Crenshaw, Jr.
)	
MEHRAN JANBAKHSH)	

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant Mehran (“Ron”) Janbakhsh moves to continue his sentencing hearing currently scheduled for September 5, 2025, at 10:00 am. For the following reasons, Defendant moves to continue the sentencing hearing until on or after November 2025. Undersigned counsel has conferred with counsel for the United States of America who do not oppose this motion.

Defendant’s plea agreement contemplates that Defendant will cooperate with the government in a highly related case, NO. 3:22-cr-00340, pending in this Court. It is anticipated Defendant would testify in a trial now scheduled in front of this Court on July 22, 2025, NO. 3:22-cr-00340 (DE 132). Further, the sentencing hearing of a former co-defendant will not occur until December 13, 2025. DE 213.

Counsel is authorized to state that the government is not opposed to this motion for a continuance and has seen a draft of same prior to filing with this Court.

Respectfully submitted,

/s/ David L. Raybin
David L. Raybin, #3385
Raybin & Weissman, P.C.
424 Church Street, Suite 2120
Nashville, Tennessee 37219
615-256-6666
DRaybin@NashvilleTnLaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy was served via the Court's electronic case filing system_ on June 25, 2025.

/s/ David L. Raybin
David L. Raybin